

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

LAS MARTAS, INC.

Debtor.

CASE NO. 22-02380 (ESL)

CHAPTER 12

**MOTION FOR LEAVE TO REPLY TO DEBTOR'S "RESPONSE TO MOTION FOR RELIEF FROM STAY" AND FOR EXTENSION OF TIME**

(Related ECF No. 224)

TO THE HONORABLE COURT:

COMES NOW secured creditor Condado 5, LLC ("Condado"), through the undersigned counsel, and respectfully moves the Court for an order granting it leave to reply to the *Response to Motion for Relief from Stay* (ECF No. 224) pursuant to PR L. Civ. R. 7(c), and in support hereof, states:

1. On July 2, 2025, Condado filed a *Motion for Relief from Stay* (ECF No. 211).
2. On June 25, 2025, the Court entered an *Order* for the Debtor and parties in interest to file a response to the *Urgent Motion* on or before July 2, 2025 (ECF No. 205).
3. On July 16, 2025, the Debtor filed a *Response to Motion for Relief from Stay* (the "*Opposition*", ECF No. 224).
4. Pursuant to PR L. Civ. R. 7(c), Condado requests leave to reply to the Debtor's *Opposition* (ECF No. 224) or otherwise plead within 2 days, through and including Monday, July 22, 2025.
5. Condado's reply will be limited to the averments made by the Debtor in its *Opposition*.
6. This request is made in good faith and for a good cause.

WHEREFORE, Condado respectfully prays the Court grants it leave to reply to the Debtor's *Opposition* (ECF No. 224) or otherwise plead within 2 days, through and including **Monday, July 22, 2025**.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on this 17<sup>th</sup> day of July, 2025.

This motion does not require objection notice pursuant to PR LBR 9013-1(c)(3)(B).

Certificate of Service

We hereby certify on this same date, we electronically filed the foregoing with the Clerk of the Court using the Next Gen CM/ECF system, which will send notification of such filing to all Next Gen CM/ECF participants in this case, including the Debtor's counsel, the Chapter 12 Trustee, the U.S. Trustee for Region 21, and all parties that requested notice. Motions and orders processed through CM/ECF are "presumed to be served on the same date of the electronic filing". P.R. Elec. Power Auth. v. Vitol, Inc., 298 F.R.D. 23, 26 (D.P.R.2014).

July 17, 2025  
San Juan, PR

**Ferraiuoli LLC**

Attorneys for Condado  
American International Plaza  
250 Muñoz Rivera Avenue  
6th Floor  
San Juan, PR 00918  
PO Box 195168  
San Juan, PR 00919-5168  
Phone: (787) 766-7000  
Facsimile: (787) 766-7001

/s/ Gustavo A. Chico-Barris  
GUSTAVO A. CHICO-BARRIS  
USDC-PR No. 224205  
[gchico@ferraiuoli.com](mailto:gchico@ferraiuoli.com)

/s/ Tomás F. Blanco-Pérez  
TOMAS F. BLANCO-PEREZ  
USDC-PR No. 304910  
[tblanco@ferraiuoli.com](mailto:tblanco@ferraiuoli.com)